

Exhibit 16

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
OPIATE LITIGATION Case No. 17-md-2804

This document relates to: Judge Dan
Aaron Polster

The County of Summit, Ohio,
et al., v. Purdue Pharma, L.P.,
et al.
Case No. 17-OP-45004

The County of Cuyahoga v. Purdue
Pharma, L.P., et al.
Case No. 17-OP-45090

The City of Cleveland, Ohio v.
Purdue Pharma, L.P., et al.
Case No. 18-OP-45132

Videotaped Deposition of Allisyn Leppla
Cleveland, Ohio
January 15, 2019
9:18 a.m.

Reported by: Bonnie L. Russo
Job No. 3191877

1 Deposition of Allisyn Leppla held at:

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4
5
6 Napoli Shkolnik, PLLC
7 55 Public Square
8 Suite 2100
9 Cleveland, Ohio 44113
10
11
12
13
14

15 Pursuant to Notice, when were present on behalf
16 of the respective parties:
17
18
19
20
21
22
23
24
25

1 APPEARANCES:

2 On behalf of Cuyahoga County:

SHAYNA E. SACKS, ESQ.

3 NAPOLI SHKOLNIK, PLLC

360 Lexington Avenue, 11th Floor

4 New York, New York 10017

212-397-1000

5 ssacks@napolilaw.com

6 On behalf of Johnson & Johnson and Janssen

Pharmaceuticals, Inc.

7 GIUSEPPE W. PAPPALARDO, ESQ.

TUCKER ELLIS, LLP

8 950 Main Avenue

Suite 1100

9 Cleveland, Ohio 44113

216-592-5000

10 gwp@tuckerellis.com

11 On behalf of Walmart, Inc.

KRISTIN S.M. MORRISON, ESQ.

12 JONES DAY

North Point

13 901 Lakeside Avenue

Cleveland, Ohio 44114

14 216-586-3939

kmorrison@jonesday.com

15 On behalf of Endo Pharmaceuticals, Inc., Endo

16 Health Solutions, Inc., Par Pharmaceuticals,

Inc. and Par Pharmaceutical Companies, Inc.:

17 NICOLE LEIBOW, ESQ.

(Via Teleconference)

18 ARNOLD & PORTER

250 West 55th Street

19 New York, New York 10019

212-836-7838

20 nicole.leibow@arnoldporter.com

21 On behalf of Cardinal Health, Inc.:

WILLIAMS & CONNOLLY, LLP

22 PAUL E. BOEHM, ESQ.

MELINDA JOHNSON, ESQ.

23 725 12th Street, N.W.

Washington, D.C. 20005

24 202-434-5000

pboehm@wc.com

25 mkjohnson@wc.com

APPEARANCES (CONTINUED):

On behalf of CVS Indiana, LLC and CVS Rx Services, Inc.:

ZUCKERMAN SPAEDER, LLP

DANIEL P. MOYLAN, ESQ.

100 East Pratt Street, Suite 2440

Baltimore, Maryland 21202

410-332-0444

dmoylan@zuckerman.com

On behalf of AmerisourceBergen Drug Corporation:

MICHAEL J. SALIMBENE, ESQ.

(Via Teleconference)

REED SMITH, LLP

Three Logan Square, Suite 3100

1717 Arch Street

Philadelphia, Pennsylvania 19103

215-241-7910

msalimbene@reedsmith.com

On behalf of McKesson Corporation:

COVINGTON & BURLING, LLP

JOHN W. ZIPP, ESQ.

(Via Teleconference)

One CityCenter

850 Tenth Street, N.W.

Washington, D.C. 20001

202-662-6000

jzippp.com

On behalf of Mallinckrodt and Spec Gx, LLC:

JOSH GOLDSTEIN, ESQ.

ROPES & GRAY, LLP

Prudential Tower

800 Boylston Street

Boston, Massachusetts 02199

617-951-7000

joshua-goldstein@ropesgray.com

-and-

JESSICA R. SORICELLI, ESQ.

ROPES & GRAY, LLP

1211 Avenue of the Americas

New York, New York 10036

212-596-9000

jessica.soricelli@ropesgray.com

Also Present: Daniel Russo, Videographer

C O N T E N T S

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(Exhibits attached with transcript.)

1 A. That became a joint project in 2018.

2 Q. Do you know why?

3 A. There was -- it -- it's my
4 understanding that there were language changes.
5 I -- I don't know if it was legislation, but
6 there were language changes that mandated that
7 ADAMHS Boards have control of county opiate
8 task forces.

9 Q. But in Cuyahoga County, that had not
10 been true up until this past year, right?

11 A. That is my understanding.

12 Q. Okay. When was the Cuyahoga County
13 Opiate Task Force established?

14 A. Officially established in 2010.

15 Q. When you say it was officially
16 established in 2010 --

17 A. Uh-huh.

18 Q. -- does that mean that there was
19 something like this that existed prior to 2010
20 but it just wasn't official?

21 A. Prior to 2010 we had a small group
22 of individuals who primarily dedicated their
23 time to drug take-back events. And so there
24 was a smaller foundation of individuals from
25 the organizations that are still currently

1 represented on the task force.

2 But in 2010 is when the Ohio
3 Department of Health partnered with
4 FleishmanHillard, and it officially kicked off
5 the Cuyahoga County Board of Health. So in --
6 in 2010 was the formal inception and
7 establishment of the Opiate --

8 Q. When did --

9 A. -- Task Force.

10 Q. I'm sorry.

11 A. No. It's okay.

12 Q. When did the unofficial group start
13 to do its work in terms of addressing the
14 opioid epidemic in Cuyahoga County prior to the
15 2010 establishment of the task force?

16 A. I don't recall precisely what year
17 that occurred. We began working in putting
18 forth some efforts in 2006 -- as far back as
19 2006. I don't know specifically what year the
20 other groups came together.

21 Q. Were you involved in the efforts
22 here in Cuyahoga County to address the opioid
23 abuse epidemic that began in 2006?

24 A. Yes.

25 Q. What were your responsibilities back